

EXHIBIT C

-----Original Message-----

From: Patel, Manini [mailto:Manini.Patel@Pfizer.com]
Sent: Friday, November 18, 2005 9:35 AM
To: Calder, Courtney
Cc: Everts, Mary Ann; Phelan, Kevin (New York)
Subject: RE: : Neurontin clarification by phone request
Importance: High

Dear Courtney;

I am responding to your email dated October 20, 2005 regarding the FDA's suggested labeling changes for Neurontin and your email dated October 27, 2005 providing additional clarifications.

Pfizer has reviewed FDA's suggested revisions as well as the additional clarifications and will be making the changes requested by the FDA. Pfizer would also like to respond to two of the clarifications provided by the Agency in the October 27 email regarding the event terms "suicidal" and "suicide gesture":

FDA comment on event term Suicidal:

1. We think that "suicidal" should be deleted because its meaning is unclear. It is not clear what, as an adjective, it is referring to since there is no noun following it.

Pfizer's response:

The term "suicidal" has been included in the Neurontin US Package Insert since the original approval of the add-on Epilepsy indication in 1993. The term "suicidal" was taken from the modified CoStart dictionary and included the following reported investigator terms - "attempted suicide" and "suicide ideation." The labeled term "suicidal," therefore, included the term "suicide attempt" and was an infrequent event listed in the "Other Adverse Events Observed During All Clinical Trials: Clinical Trials in Adults and Adolescents with Epilepsy" section.

FDA comment for event term Suicide gesture:

2. "Suicide gesture" is a less clear term than "suicide attempt." If interpreted as meaning "suicide attempt," the current placement of the term with respect to the frequency of its occurrence in clinical trials is incorrect. According to the analysis submitted in September, 2004, suicide attempts occurred in .12% of patients participating in non-placebo-controlled adult add-on epilepsy trials and 0.17% of patients in adult add-on placebo-controlled studies. Therefore, "suicide attempt" should be listed as an infrequent adverse event.

Pfizer's response:

The event term "suicide gesture" was not intended to encompass "suicide attempt," but instead reflects self- injurious behavior associated with no intent to die. In other words, "suicide gesture" describes behavior that is intended to effect change in others or the environment or

intended to relieve distress (e.g., superficial cuts or scratches, hitting/banging, or burns), and was a rare event listed in the "Other Adverse Events Observed During All Clinical Trials: Clinical Trials in Adults and Adolescents with Epilepsy" section. Nonetheless, Pfizer will agree to make the change at the FDA's request.

In light of the foregoing, the term "suicide attempt" will now replace the terms "suicidal" and "suicide gesture," and will be listed as an infrequent event under the "Other Adverse Events Observed During All Clinical Trials: Clinical Trials in Adults and Adolescents with Epilepsy" section on the revised label. In addition, Pfizer will add the term "suicide" as a rare event in this same section. Finally, "suicide attempt" will be listed as an infrequent event in the "Clinical Trials in Adults With Neuropathic Pain of Various Etiologies" section of the revised label.

If agreed we will proceed with labeling changes for Neurontin.

Thank you and Regards

Manini